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IRAQ ADMINISTRATIVE REFORM PROJECT

MONTHLY PROGRESS REPORT JULY, 2015

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ACRONYMS

COMSEC	Council of Ministers Secretariat
COP	Chief of Party
DG	Director General
DGGC	Directorate General of Government Contracts
FAQs	Frequently Asked Questions
FY	Fiscal Year
GO	Governor Office
Gol	Government of Iraq
HQ	Headquarter
IDMS	Iraq Development Management System
IT	Information Technology
KMoLSA	Kurdistan Ministry of Labor and Social Affairs
KRG	Kurdistan Regional Government
MoE	Ministry of Electricity
MoH	Ministry of Health
Mol	Ministry of Interior
MoO	Ministry of Oil
MoP	Ministry of Planning
MoTr	Ministry of Transportation
MoU	Memorandum of Understanding
MRC	Midland Refineries Company
MSI	Management Systems International
NCMDIT	National Center for Management Development and Information Technology
OJT	On- Job-Training
OPC	Oil Pipelines Company
SBDs	Standard Bidding Documents
SCOP	State Company for Oil Projects
SOC	South Oil Company
SRC	South Refineries Company
SQL	Structured Query Language
SSN	Social Safety Net
ToT	Training of Trainers
USAID	United States Agency for International Development
USG	United State Government

SUMMARY

USAID-*Tarabot* continued engaging with GoI entities throughout the holy month of Ramadan despite the Iraqi Government reducing working hours to six hours per day. The holiday of Eid Al-Futir, and the heat wave that hit the country resulted in further reduction of working hours.

In July, USAID-*Tarabot* continued its program of administrative assistance to government entities, predominantly through the provision of hands on training, technical guidance, and specific capacity building strategies. Significant progress was made this month in several areas.

The preparation continues for the Advanced Procurement Training of Trainers (ToT) workshop in Turin, Italy for graduates of USAID-*Tarabot*'s procurement training programs. The training is scheduled from August 31 - September 11, 2015. However, it has been postponed until October due to Arabic speaking trainer availability and logistical issues. The 11 selected candidates will compile the primary procurement technical advising body for the Ministry of Planning (MoP), advising and guiding future procurement growth and regulatory reform.

MoP Help Desk led by the MoP Director General for Government Contracts (DGGC), Dr. Azhar Hussein, continued supporting GoI entities in procurement areas. The formalization of this procurement resource represents one of the most visible steps of progress in the areas of procurement and regulatory reform. USAID-*Tarabot* and MoP continue to streamline this resource bank and its activities.

USAID-*Tarabot* revised and resubmitted the Oil Sector Rapid Assessment Report to USAID for approval. The collaboration and cooperation between expatriate advisors, local *Tarabot* staff, as well as government representatives from both countries was a truly encouraging sign of the continued partnership between the Iraqi and U.S. governments. USAID-*Tarabot* staff continues to receive and incorporate USAID's feedback, which will be used to construct a final official report for the Mission and GoI's use in determining potential future aid.

USAID-*Tarabot* continues to work alongside representatives of the Kurdistan Regional Government to launch the Social Safety Net. The opening ceremony was postponed to late August, due to unfinished work from the social welfare sites.

Finally, the Iraq Development Management System (IDMS) was reactivated this month, thanks to additional funding from USAID for the project's extension period. Hosted by MoP, USAID-*Tarabot* is assisting MoP in conducting test runs to the system using real records for on-going projects.

Events: USAID-*Tarabot* project engaged in a variety of activities during July 2015. The following breakdown is a disaggregation of the events:

1. **Total Events:** USAID-*Tarabot* teams held **(60)** events; representing **(1)** workshop and **(59)** meetings.
2. **Locations:** **(44)** of these events were held at locations in Baghdad, while **(3)** events were delivered in Basrah, **(1)** events in Najaf, and **(12)** events in Erbil.
3. **Institutions:** a total of **(12)** government institutions were involved in USAID-*Tarabot* activities in July; representing **(6)** ministries, **(1)** governorate, and **(5)** ministry directorates.
4. **Tarabot Technical Teams:** **(40)** events were implemented by Procurement Advisory Unit, **(5)** events were implemented by Oil Assessment Team, and **(12)** events were implemented by SSN Senior Advisor in Kurdistan Region, and **(3)** by IDMS Team.

I. PUBLIC PROCUREMENT CAPACITY BUILDING

As part of its ongoing efforts to improve Iraq's service-oriented capital investments, USAID-Tarabot is partnering with the Ministry of Planning (MoP) to support the Government of Iraq (GoI) to make use of its investment budget through fair and transparent procurement systems. These reforms will improve service delivery by lending efficiency and transparency to the procurement process. They will help to create an environment conducive to fair and open competition in the tendering and awarding contracts, and build the confidence of the private sector in the government's bidding process. In the past, reliance on disorganized, paper-based systems and antiquated processes has hindered the transparency and efficiency of government procurement. The government needs to make concrete reforms to incorporate the expertise of international firms, which the success of complex large projects often rests. USAID-Tarabot will work with the MoP to deliver complementary capacity building activities and systems reform with the ultimate goal of establishing unified procurement system aligned with international standards.

I.1 Ministry of Planning Capacity Building

As the chief coordinating entity for public contracting in Iraq, MoP has been a longstanding partner of USAID-Tarabot in procurement reform, and is positioned to take the lead on Iraq's national-level procurement reform initiative. USAID-Tarabot took steps to prepare the ministry to do so through knowledge transfer and anchoring of sound practices. Procurement training provided for the MoP is bolstered by hands-on experience, as MoP staff partner with USAID-Tarabot advisors to jointly conduct workshops and applied trainings for other GoI entities. These ongoing activities are important for MoP staff to garner knowledge about procurement and acquire training skills, which will be critical as the national reform process moves forward.

I.1.1 Development of Public Procurement ToT Program

USAID-Tarabot continued coordinating with the International Training Center of ILO in Turin, Italy to arrange the expert-level training course on public procurement for eleven ToT graduates (6 males, 5 females). This training was scheduled from August 31 through September 11, 2015. However, it has been postponed until October due to Arabic speaking trainer availability and logistical issues, Contract terms are being discussed with ILO.

I.1.2 Public Procurement Help Desk

With the opening ceremony of the ministry Help Desk is tentatively set for early September, USAID-Tarabot continued mentoring Help Desk staff to ensure all the requirements are in-place before the opening ceremony. This included:

- Developing the webpage for the Help Desk. For more information, please go to the following link: <http://www.mop.gov.iq/mop>;
- Developing a brochure for frequent asked questions and their answerers;
- Developing questionnaire for inquiries;
- Developing standard format for advertising and written notifications of awarding the bid to the contractors;
- Developing standard formats for the three types of bidding documents (supplying goods, execution of works, and non-consultancy services);
- Preparing a brief introduction for each type of bidding document.
- Mentoring help desk staff on bidding documents for:
 - consultancy services;
 - non-consultancy services;
 - prequalification criteria for books and school supply document;
 - turn-key projects, and project designs and implementation.



*MoP Help Desk Website Interface
(Under development)*

*MoP Help Desk Staff update their
webpage*

Additionally, MoP reactivated the use of procurement indicators, and instructed Gol entities to restart using the 14 identified indicators; that reflect the performance of procurement process. Gol entities are now obligated to report status on all 14 indicators to MoP on a quarterly basis.

This came as a result of on-going influence of USAID-Tarabot, and encouraging Dr. Azhar Hussein, Director General for Government Contracts (DGGCs) to re-activate this monitoring tool. Since the early this year, USAID-Tarabot provided technical guidance to targeted Gol entities on the effective outcome of using procurement indicators. Some Gol entities (i.e. Basrah Contracting Directorate) are using these indicators for internal monitoring of the contracting process.

MoP Help Desk continued supporting Gol entities in the following activities:

i. Raising the awareness of Gol Entities on Public Procurement

MoP continued implementing their procurement training plan for 2015, with the implementation of a five-day workshop conducted at the National Center for Management Development and Information Technology (NCMDIT) in Baghdad; for 19 government officials (11 males, 8 females). The standard bidding documents (SBDs) were explained to representatives from Ministries of Defense, Health, Interior, Labor & Social Affairs, Municipality & Public Works, Science & Technology, Transportation, and Water Resources. ToT graduate, Eng. Nora Waled Khalid from MoP DGGCs delivered the session of SBDs for consultancy services.

Meanwhile, COMSEC has requested from USAID-Tarabot to extend its training on SBDs and MoP Regulations for Implementing Government Contracts to 16 officials. This came as a result of COMSEC's on-going attendance to MoP procurement training in 2015

ii. Improvements on the Standard Bidding Documents

USAID-Tarabot worked with the designated committee from MoP DGGC, to complete the revisions of the SBDs. MoP has now requested USAID-Tarabot assistance in translation of the following bidding documents to English:

- Specialized Bidding Documents:
 - Documents for purchasing medicine, and medical supplies and instruments;
 - Pre-qualification documents.
- Non-Specialized Bidding Documents:
 - Supplying goods with Arabic language;
 - Design and execution of works for general contracts;

- Design and execution of works for limited contracts;
- Work contracts;
- Evaluating bids (supplying goods and works).

I.2 Ministries and Governor Offices Capacity Building

I.2.1 Implementation of Standard Bidding Documents

Due to financial constraints, no site visits were scheduled this month by the teams of experts for applying SBDs to pilot projects.

I.2.2 Comprehensive Capacity Building for selected Ministries and Governor Offices (11 Elements Program)

USAID-Tarabot is currently working with MoP to coach Six GoI Entities (4 ministries and 2 Governor Offices) with Implementing a Comprehensive Procurement Reform Package; this will be in compliance with all procurement requirements including implementation of the following items: Procurement Laws and Regulations, Procurement Department, Have Qualified Procurement Staff, Standard Procurement Process, Procurement Plans, Standard Bidding Documents, Procurement Performance Indicators, Archiving system, Reporting on Procurement Activities, Procurement Webpage and Subscription to dg Market.

Activities under this package are implemented according to the agreed-upon action plan between USAID-Tarabot and targeted ministry and GO. Progress for each ministry and governor office can be reviewed below:

Ministry of Electricity (MoE)

This month, the Minister of Electricity, Mr. Qasim Al Fahdawi approved the recommendations for modifying and developing the ministry procurement process. The recommendations were compiled as a result of the assessment conducted by USAID-Tarabot to seven ministry directorate in June; with the support of the ministry Central Quality Division and Investments and Contracts Department. Implementation of these recommendations will help the ministry solve obstacles in the procurement process. The solutions have been categorized according to the responsible party; where some requires intervention from higher management in the ministry (i.e. minister, deputy minister), while others require actions from the ministry divisions, departments and directorates.

The ministry began implementation of these recommendations by:

- applying SBDs to one new pilot project “design, supply, installation and implementing 14 new GIS substation 132/ 33 KVA”, with total estimated cost US\$ 266 million. MoP team of experts led by two ToT graduates, Eng. Thikra Mohammed and Marwa Saleh visited the ministry; and delivered a three-day workshop on SBDs. 84 officials (55 Males, 29 females) attended the workshop representing the ministry HQ, and directorates for electricity production, distribution, and transmission;
- instructing all ministry directorates to reignite using the 14 MoP identified procurement indicators to monitor procurement process. The ministry Central Quality Division, and Contracts and Licenses Directorate will be responsible for assisting ministry directorates to report on those indicators on a quarterly basis. In addition to conducting semi-annual evaluations for each ministry directorate; these indicators will measure procurement performance;

- communicating with MoP and inquiring on the electronic system used by MoP in archiving procurement records. This will help MoE in the quick recovery of procurement files when needed, better and safe storing of documents, and avoid paper damage.



SBDs Training to MoE Staff



MoP ToT graduate explain Electro-mechanical bidding documents

Ministry of Health (MoH)

USAID-Tarabot interventions with the ministry in July resulted in:

- **The Development of Procurement Report**

Contracts Department developed its first six month procurement report (January 01 – Jun 30, 2015) thanks to USAID-Tarabot 's influence and on-going technical guidance. The report addresses contracting issues and observations; in addition to information on future planning, training and recommendations. Considering the limited activities in the procurement process due to this year's financial constraints in the Iraqi budget, the ministry plans to issue a procurement report only every six months.

- **Re-activating the use of procurement indicators**

USAID-Tarabot met with Mr. Methaq Mohammed, Contracts Manager, to move forward with using Procurement Indicators. Earlier this month, MoP reactivated the use of procurement indicators, and instructed Gol entities to restart using the 14 identified indicators. These indicators reflect the performance of procurement process. Gol entities are now obligated to report status on all 14 indicators to MoP on a quarterly basis.

Mr. Methaq was appointed over a year ago, and therefore has limited knowledge on the procurement indicators. USAID-Tarabot introduced the 14 indicators identified by MoP, the relevance of using them, and establishing a process for reporting to MoP. Further meetings will be conducted with the contracting staff to establish a sustainable process for collecting and reporting on these indicators. Some of these indicators are being used internally to ensure compliance with MoP regulations; however, they are not reported to higher management.

- **Mentoring new Contracts Department staff**

USAID-Tarabot assisted the newly hired Contracts Department staff in understanding their duties and roles in the department. Last month, four employees transferred from other ministry departments to the Contracts Department. This resulted from USAID-Tarabot's continued technical guidance, encouraging the Contracts Department Manager to request additional staff for improving the ministry's procurement performance, and complying with MoP structure and staffing for exercising procurement functions.



MoH issue their 1st Procurement Report



Mentoring new Contracts Department staff

Ministry of Oil (MoO)

USAID-Tarabot worked with the State Company for Oil Projects (SCOP) to move forward with subscribing in the dgMarket. The two methods for uploading projects to the dgMarket (manually and automatically) were explained. USAID-Tarabot is encouraging SCOP to announce tenders onto this site to attract international companies to participate in tendering.

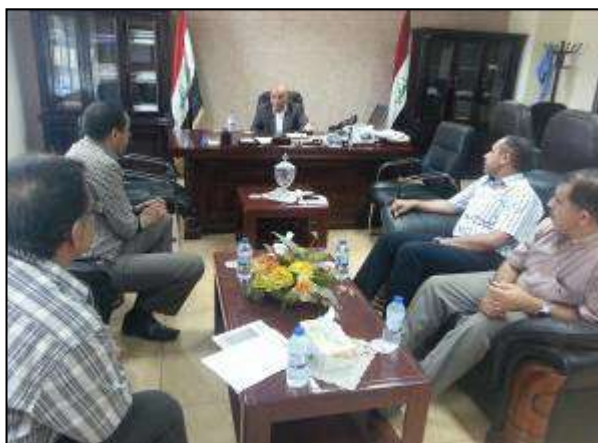
In the meantime, visits were made to Oil Pipelines Company (OPC), Midland Refineries Company (MRC), South Oil Company (SOC) and South Refineries Company (SRC) to develop a joint action plan with the aim of strengthening their procurement function. The action plans will serve as baseline for short term technical solutions and long term administrative solutions. Tarabot activities will include training on SBDs and MoP regulations for implementing government contracts, applying SBDs to selected pilot projects, and using cost estimation techniques.



USAID-Tarabot Public Procurement Team Visit to SOC

Ministry of Transportation (MoTr)

USAID-Tarabot began coordinating with the ministry contracts department to prepare for MoP's visit represented by Dr. Azhar Hussein and Mr. Nael Shabaro, the Tarabot COP. The purpose of the visit is for the ministry to introduce the online electronic system for updating procurement plans to Dr. Azhar. This online system allows all ministry directorates to update their procurement plans under the supervision of the ministry HQ. Additional support was provided to the Contracts Department to finalize the June Procurement Report.



Updating Ministry procurement plan using the online system

2. OIL SECTOR ASSESSMENT

This month, USAID-Tarabot officially submitted the Rapid Assessment for Iraqi Oil Sector to USAID for feedback. Additionally, USAID-Tarabot began developing a work plan for the next nine months that outlines future activities. This includes the strategic contract distribute resolutions, pin point short term technical solutions and long term administrative and technical solutions.

The final recommendations of the Iraq Oil Sector Rapid Assessment were presented to the Minister of Oil, Adil Abdul Mahdi in presence of U.S. Ambassador, Stuart E. Jones, and USAID Mission Director, Douglas Ball. During the meeting, USAID-Tarabot COP, Nael Shabaro outlined the proposed future intervention by Tarabot. This includes the strategic contract distribute resolutions, pin point short term technical solutions and long term administrative and technical solutions. The Minister confirmed the results of the assessment and recommended another meeting with senior officials from the ministry, to agree on future joint activities.



Iraq Oil Sector Rapid Assessment presented to the Minister of Oil

Meanwhile, Tarabot Oil team continued its engagement with ministry of oil directorates and state companies to discuss the assessment's findings and plans for future activities. According to the MoU signed between USAID and Ministry of Oil, USAID-Tarabot visited State Company for Oil Projects and met with Dr. Subhi Al-Ghanim, the Quality and Performance Management expert. A review was made to the company implementation of on-going projects. To facilitate the implementation process, USAID-Tarabot will begin mentoring SCOP on improving the systems and procedures for:

- Procurement and project management;
- Integrating oil and gas projects economically and technically;

- Organization development and quality management;
- Attracting local and foreign investments;
- Contracting mechanisms for investors, to execute oil and gas projects.

A committee led by Dr. Ihsan Al-Attar has been established to coordinate the efforts between SCOP and USAID-Tarabot.



Tarabot Oil team discuss Infrastructure Planning and Regulatory Reform with Dr. Subhi El-Ghanim

3. SOCIAL SAFETY NET (SSN) PROGRAM WITH KRG

Under this extended initiative, USAID-Tarabot is working closely with the KRG Ministry of Labor and Social Affairs (KMOLSA), and its four main sites in Erbil, Dahuk, Sulaymaniyah and Garman to link and activate the SSN system. To successfully reach the goal of launching the SSN system in KRG, the following joint activities were implemented:

- **Improving internet connectivity at the ministry HQ and SSN sites**

The internet provider completed providing internet service to Sulaymaniyah Social Welfare site, and began working on supplying Garman site with internet service. This is the first step towards connecting the SSN system for these two Social Welfare sites with the main server at the ministry HQ.

- **Connection of branches or sub-site to the four main sites**

With internet service equipped for both Sulaymaniyah and Garman Social Welfare sites (main sites), the next step is to connect the branches (sub-sites). However, USAID-Tarabot SSN advisor was not given security clearance to move outside Erbil. Tarabot is coordinating with USAID and the Minister of Labor and Social Affairs for KRG to resolve this issue.

Last month, Koya and Soran Social Welfare sites (branches) were connected with Erbil Social Welfare site (main site).



OJT for domain controller server's reinstalling and configuring for KRG officials

- **Building the capacity of ministry staff in using the new SSN system**

On-job-training (OJT) for domain controller server's reinstalling and configuring was completed for 10 KRG officials; representing ministry HQ and social welfare staff from the four main sites (Erbil, Dahuk, Sulaymaniyah and Garman). This workshop provided

knowledge to participants on how to reinstall SSN domain controller server, and increases their capacity on using SSN infrastructure.

The next step is to train selected staff on data migration to the new SQL database and identifying duplicate records.

- **Data cleansing of current records, by removing duplicate records, completing missing information, and performing corrections**

USAID-Tarabot is waiting for the main sites to complete data cleansing. Not all sites have completed this process. However, reports were generated by USAID-Tarabot for each site using the old SSN databases, and submitted to them last May.

Thus, this issue was addressed with the Minister to speed up the process. .

- **Data migration of SSN records from the old database to the new database**

Work continued with KMOLSA IT Manager on completing the new SQL database. Delay of submission of the databases from the four main sites has affected the process. USAID-Tarabot addressed this issue with the Minister.

- **Preparing for the opening ceremony**

USAID-Tarabot began coordinating with KMOLSA to prepare for the opening ceremony. Meetings were conducted with the IT Manager, Director of Public and Foreign Relations, and DG for Administration and Finance to review implementation progress of the SSN, prepare the necessary materials and documentation for the opening ceremony, and set a timeframe to begin data migration to the new SQL system.

The original target for the opening ceremony was shifted from the beginning of August to September 2015, due to reasons beyond Tarabot's control. This was discussed with the Minister during a meeting held in the presence of USAID COR, Tarabot's COP, senior officials from the ministry, and DGs from the four Social Welfare sites (Erbil, Dahuk, Garman and Sulaymaniyah) later in this month. USAID-Tarabot briefed the minister on the progress made during the last few months, and pointed out the unfinished work due to reasons beyond Tarabot's control. Necessary intervention from the Minister includes



USAID-Tarabot COP Review SSN progress with KRG Minister of Labor and Social Affairs

- **Connection of branch or sub-sites to the main site**

For Erbil, the two branches are connected to the main site. However, the branches for Dahuk, and Sulaymaniyah are not connected. Tarabot was not able to obtain security clearance to travel to the two provinces and begin the connection process. The Minister agreed to intervene so Tarabot SSN team can travel next week to Sulaymaniyah and Dahuk.

- **Data cleansing of records, and migration to the new SQL SSN Database**

Last May, USAID-Tarabot delivered duplicate reports generated from the old SSN ACCESS Database to the Minister. The Minister informed DGs for the four main social welfare sites to begin cleansing the data by removing duplicate records and completing the missing information for the remaining records. With the exception of Erbil main site, the remaining three sites have been slow to respond. The Minister has given the four main sites less than one month to complete the data cleansing, and migration to the new SQL SSN database.

At the end of the meeting, the Minister agreed to postpone the opening ceremony till the end of August, early September to complete all the requirements for successfully launch the SSN system.

4. IRAQI DEVELOPMENT MANAGEMENT SYSTEM (IDMS)

USAID and Tarabot reactivated this initiative, due to USAID additional funding for the extension period.

The Iraq Development Management System (IDMS) is a comprehensive web-based application, available in Arabic and English, which manages the whole cycle of government and donor-funded development projects in Iraq. The system will serve as a reliable and credible source of information on the distribution of development projects according to sector, location, and implementing institution. The IDMS feeds information for the decision-making process in planning, and will illuminate project implementation performance by ministry, sector, or individual projects. This information will allow government officials to make wiser decisions with its capital investment resources, and to better identify and address any weaknesses in implementation. This critical step in modernizing Iraq's public administration will contribute to greater efficiency in the capital investment cycle, as well as promote greater transparency and accountability in the allocation of development funds.

Hosted by the Ministry of Planning, USAID-Tarabot worked with MoP before Tarabot's extension to launch the IDMS at the ministries and in provinces. However, due to technical issues between the supplier, Synergy International Inc and MoP, the IDMS was never nationalized. Meanwhile, USAID-Tarabot is training targeted staff members from MoP and other Gol entities to update and enter project information into the system.

In late May 2015, MoP initially accepted the IDMS system, and officially requested from USAID-Tarabot to provide hands-on-training to ministries and governorates. The system will finally be accepted by Ministry of Planning once Synergy International Inc. completes all the agreed upon modifications, in addition to fixing any bugs that might appear during the six-month warranty period.

A kick-off meeting was conducted with senior officials from MoP to discuss the launching and deployment of the IDMS. This was followed by two meetings to agree on a work plan, to



Kick-off meeting with senior officials from MoP to discuss the launching and deployment of the IDMS

move forward with this initiative. These meetings were attended by:

- Mr. Qasem Enaya Faraz, Deputy Minister for Administration;
- Dr. Maher Hammad Gohan, Deputy Minister for Technical Affairs;
- Mr. Emad Nagi DG of IT;
- Mr. Bashar Hatam, Follow-up Unit Manager/ Government Investment Department;
- Mr. Saif Falah, International Cooperation Section;
- Hala Kamel, Follow-up Unit/ Government Investment Department;
- Mr. Abbas Fadhil, Deputy DG for Sectoral Planning, and;
- Mr. Hasan Muaed, Administrative Development Department.

This was followed by meetings with the ministry of planning IDMS helpdesk team. To move forward with this initiative, several sites visits were conducted to 7 selected Gol entities (5 ministries and 2 provinces to check the readiness of these sites to deploying the IDMS. The 7 Gol entities are:

- Ministry of Water Resources;
- Ministry of Labor and Social Affairs;
- Ministry of Higher Education;
- Ministry of Construction and Housing;
- Ministry of Sciences and Technology;
- Najaf Province and
- Wasit Province.

Lastly, MoP has assembled a team consisting of 24 officials whom will undertake the responsibility of testing the new IDMS system over the next couple of months. Their main task is to begin data cleansing of the old records entered to the IDMS system, and begin entering data for on-going projects initiated since 2013. A plan is being drafted by MoP; defining USAID-Tarabot role in providing technical support throughout this process. This test run will also help MoP in assessing their strength and weaknesses in all features of the system; and identify the areas that require additional training and mentoring.

PROJECT ADMINISTRATION

Staffing, Deployment, Registration

This month, USAID-Tarabot local staff increased to 44 personnel, with the addition of technical staff working in Tarabot's core areas (Oil, SSN and IDMS).

Security

The security situation in Iraq was tense this month with ongoing fighting in the north and west of Iraq, and continued explosions and attacks in Baghdad. Military operations continue by the Iraqi Forces with the assistance of the Coalition Forces, to fight-off the Islamic State in Iraq and Syria (ISIS). Military activities in the cities of Baji and Ramadi have been the most significant. This has not affected Tarabot operations in Baghdad.

Property

The disposition of 18 armored vehicles:

MSI has 18 D class Armored Vehicles. Per US Regulations, they are classified and cannot be offered or sold to the Iraqi public and private sector. However, they can be offered to the US government or to a USG contractor.

Although they are D class vehicles and sensitive/ classified items titled to USAID, MSI and its security provider are obligated to comply with Mol regulations, since the vehicles are registered by law under the security provider in both Iraqi directorates. Under Iraqi law, they must be turned over to the Gol or exported from Iraq and not turned over to another entity within Iraq.

Acting COP is seeking additional guidance from USAID on how to proceed.